## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

RABBI MARA NATHAN, on behalf of herself and on behalf of her minor child, M.N., et al.,

Plaintiffs,

v.

ALAMO HEIGHTS INDEPENDENT SCHOOL DISTRICT, et al.,

Defendants.

CIVIL ACTION NO. 5:25-cv-00756

#### CORRECTED NOTICE OF CONSTITUTIONAL CHALLENGE TO STATE STATUTE

Pursuant to Federal Rule of Civil Procedure 5.1, Plaintiffs file this notice that, on July 2, 2025, they filed a Complaint and Motion for a Preliminary Injunction (along with supporting declarations and exhibits). The Complaint challenges the constitutionality of Texas Senate Bill No. 10 ("S.B. 10"). Specifically, Plaintiffs allege that, by requiring elementary and secondary public schools to display the Ten Commandments in every classroom, in accordance with the minimum requirements of S.B. 10, the statute violates the Establishment Clause and the Free Exercise Clause of the First Amendment to the United States Constitution.

Plaintiffs will promptly serve this Notice along with the Complaint, Motion for Preliminary Injunction, and all supporting declarations and exhibits on the Texas Attorney General via certified mail.

Dated: July 7, 2025

### Respectfully submitted,

By: /s/ Jonathan K. Youngwood SIMPSON THACHER & BARTLETT LLP Jonathan K. Youngwood Janet A. Gochman\* Noah Gimbel\* Jordan T. Krieger\* Avia Gridi\* Kristen Crow\* 425 Lexington Avenue New York, NY 10017 (212) 455-2000 jyoungwood@stblaw.com jgochman@stblaw.com Noah.Gimbel@stblaw.com jordan.krieger@stblaw.com avia.gridi@stblaw.com kristen.crow@stblaw.com

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### Counsel for Plaintiffs

- \* Motion for *Pro Hac Vice* Admission Forthcoming
- \*\* Admission Application Forthcoming

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice will be personally served on each Defendant pursuant to the Federal Rules of Civil Procedure, along with the Summonses and Complaint in this action, immediately following the issuance of the Summons documents by the Western District of Texas Clerk's Office.

I further certify that, following issuance of the Summons documents by the Western District of Texas Clerk's Office, the foregoing Notice, along with the Summonses and Complaint in this action, will be served upon the Texas Attorney General at the following address via certified mail:

Ken Paxton Texas Attorney General P.O. Box 12428 Austin, Texas 78711

Dated: July 7, 2025

By: /s/ Jonathan K. Youngwood
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